CCI Closeout Training

Broadband Technology Opportunities Program (BTOP)

WASHINGTON, DC April 25, 2013



Agenda

- Presentation on CCI Closeout Process
 - Aimee Meacham, Director, BTOP Program Services
- 2. Q&A
 - Aimee Meacham, Director, BTOP Program Services
 - Jennifer Lane, Attorney-Advisor, Federal Assistance Law Division
 - Alan Conway, Branch Chief, NOAA Grants Management Division
 - Larry Jenkins, Grants Officer, NOAA Grants Management Division



Objectives

- Define Closeout and Stakeholder Roles
- Understand the Timing Related to Closeout Activities
- Identify Recipient Closeout Requirements and Closeout Documents

What is Closeout?

- Closeout is the process of ensuring that all funded project activities are complete and that recipients have met all requirements imposed by applicable laws, regulations, Office of Management and Budget (OMB) circulars, and award terms and conditions
- Recipients can facilitate the closeout process by
 - Demonstrating completion of funded project activities
 - Understanding all administrative and legal requirements
 - Completing and submitting closeout materials in a timely manner within the closeout period



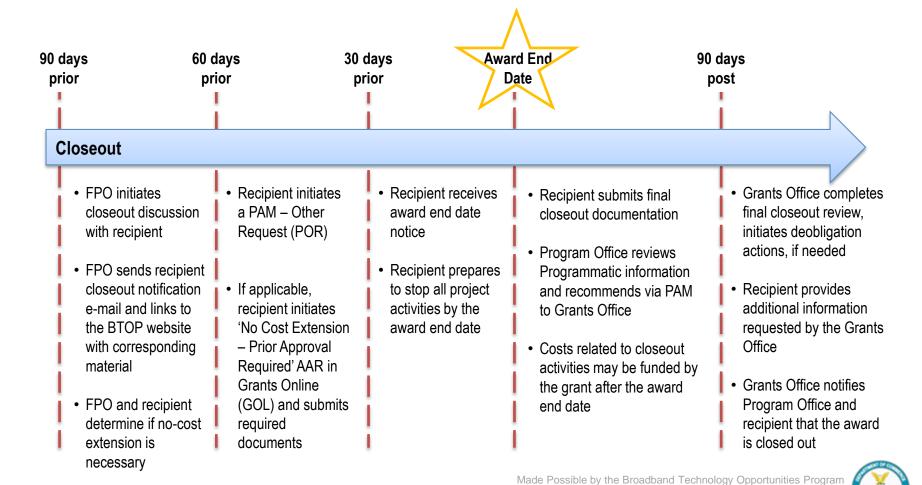


Closeout Points of Contact

- NOAA Grants Specialist
 - Serves as the recipient's main point of contact throughout the closeout process, ensuring the proper submission of documents, addressing issues with document preparation, and serving as a resource for recipient concerns
 - Performs final award reports and documentation review and evaluation
- NTIA Federal Program Officer (FPO)
 - Initiates closeout discussion, reviews, and requirements with the recipient; FPO remains active throughout the closeout process
 - Conducts preliminary review of draft award reports and documentation
- Closeout Analyst
 - Supports the Grants Specialist and FPO in working with the recipient to facilitate the closeout process



Project Closeout Timeline





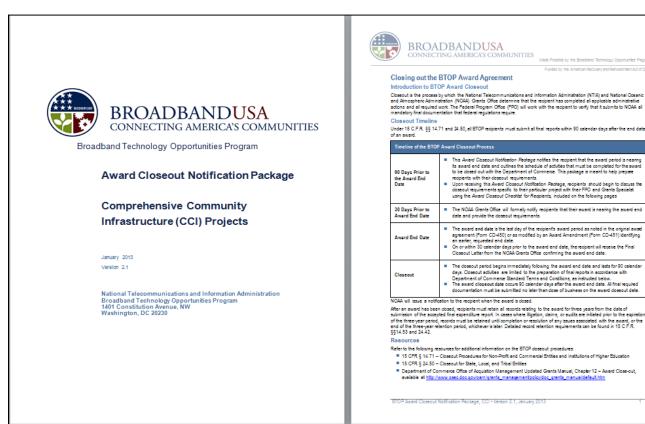
Prior to Award End Date

- FPOs will notify recipients of their upcoming award end dates and provide links to supplemental
 documentation that is posted on the BTOP website. This includes a checklist outlining the activities that
 must be completed for the award to be closed out
- Recipients should begin to discuss the closeout requirements specific to their particular projects with their FPO
- Recipients should also submit all required Federal Interest documentation to the appropriate State
 office(s) during the closeout period; and attach a scanned copy of this documentation to the final closeout
 documentation package. "Federal Interest documentation" refers to filings that establish the government's
 financial interest in substantial assets purchased or built with grant funds
- Recipients should complete any budget modification AARs prior to the award end date, if applicable





FPOs will send recipients the closeout notification memo (via email) which includes standard language regarding the closeout process, a link to the Closeout Notification Package, and the Special Award Condition (SAC) Checklist







Recipients will use the SAC Checklist to self-certify that they have complied with all BTOP award terms and conditions

BROADBANDUSA CONNECTING AMERICA'S COMMUNITIES thata Pasalita by the Enable of Extractant Technology Opportunities Proper Broadband Technology Opportunities Probleming Receives and Extraction of 2009	BROADBANDUSA CONNECTING AMERICA'S COMMUNITIES 1000 Facility for Faculture Tacheday Organization Pagent Security Interest Requirements Fundal by the Linetics Pagent and State For all by the Linetics Pagent and State Security Interest Requirements	BROADBANDUSA CONNECTING AMERICA'S COMMUNITIES (Jain Faulbile): The Faulbile of Project Completion Funds by the Faulbile of Project Completion
Special Award Condition Checklist for Project Closeout	<u>Y N N/A</u>	Y N NA
Recognition Award Number Proper Tipe	The recipient agrees that, for the estimated until life of the facility funded with this award, the project will be maintained for the purpose us befored by this award and in accordance with the terms, conditions, requirements, and provisions of the award.	The recipions completed all project construction and conducted a final image color and accordance text. The recipions complicat with all terms and conditions of the award, including appetial award conditions. The recipions is aware that all project records must be retained for a minimum.
Recipient's Authorized Representative	The excipient will notify and request permission from the National Telecommunications and Information Administration (NIIA) and the Grants Office before engaging in any proposed sale or lease of BTOP-funded sarets.	of three years.
Davis-Bason Wage Rate Requirements Y N NIA All contractors and subcontractors have complied with the Davis-Bason wage rate requirements.	The recigions will disclose to NTIA and the Grants Office any potential countries on STO-funded seats, for the estimated until life of these seates. The recigions will not encountee STO-funded seats without first receiving germanics from NTIA and the Grants Office.	By signing this checklis, I certify that all BTOP-funded activities have been completed in accordance with the award terms and conditions.
All laborers and mechanics employed on work sites have been guid at least	Subassiguest Requirements	
once a week. All covered employers have submitted a certified payroll on a weekly basis.	Y N N/A The recipient has informed subsecipients of all engoing obligations, including suddins, non-discrimination, interconnection, federal interest, and other	Signature of Recipient's Authorized Representative Date
All certified payer lib have been signed by an employer affirming that the information is correlate and accurate.	undits, non-distribution, interconnection, federal interest, and other provisions that flow down to subscriptings under the terms and conditions of the BTOP around.	
If the recipient is aware of any instances where a contractor or subcontractor was required to make wase restitution:	Environmental Assessment Compliance Requirement	
	Y N N/A The recipient has completed any required environmental assessment and	Printed Name of Recipient's Authorized Representative
De the Devis-Bason payed files contain both the previous contined payed in reports and the new contented payed in separate and the new contented payed in separate certifying water crustitation has been compeled?	related consultations, and has dome funtated compliance with all other applicable federal, state, and local environmental laws and regulations.	
Appropriate on-aire interviews have been conducted with laborers and mechanics engleyed on week sites and responses to these interviews were compared to job classifications used in the certified payrells reports to cross	Single Audit Requirements Y N N/A State, Local, and Tribal Covernments; Universities; and Non-Profit Organizations: The recipient has submitted valid single sudits (i.e., A-l-3)	
☐ ☐ Has the Department of Labor conducted any investigation involving the	Audit) to the Federal Audit Cleaninghouse within nine months of the end of the recipions's fascal year, and/or will submit such audit after the award	
recipient? 1.) Has the investigation concluded?	period, as required under OMB Circular A-133.	
2.) What was the result of the investigation?	Audt No. FY ending Dete submitted or N/A Findings	
	1	
	2	
	3	
Page 1 of 5	Pago 2 of 3	Page 3 of 3



^{*} The completed SAC checklist must be signed by the recipient's Authorized Organization Representative (AOR)



How Does a Recipient Complete and Submit Closeout Materials?

- Recipients are encouraged to work with their Grants Specialist, FPO and Closeout Analyst as they
 prepare closeout documents
- Recipients must upload the quarterly PPRs and APR in their respective report packages in PAM, just as they have done throughout the Program
 - The Final PPR for the award must be submitted by the recipient through Grants Online (GOL)
- Recipients should continue to submit quarterly and Final FFRs in GOL
- Additional closeout documents should be attached to a PAM Other Request (POR) by the end of the 90 day closeout period (e.g., UCC-1 filings)
- Recipients should anticipate and plan for closeout-related costs. Allowable costs during the closeout
 period include such activities as preparing necessary closeout documents, conducting required audits,
 and making payments on invoices for costs of project work completed and/or billed prior to the award end
 date

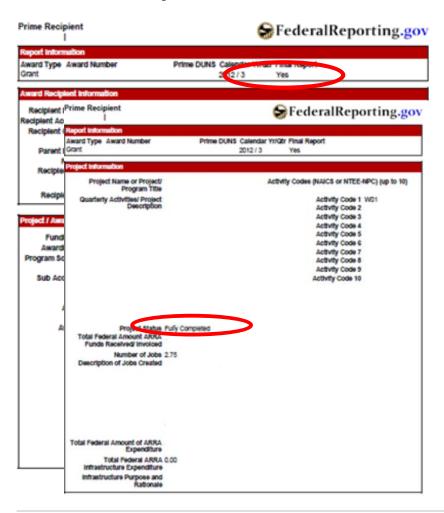




Recipients must submit the appropriate closeout documents before an award can be considered for closeout

Document	Due Date Prior to	Submission vehicle
Final ARRA	10-14 days after end of quarter	FederalReporting.gov
Final FFR (SF-425)	90 days after award end date	GOL
Quarterly PPR	30 days after award end date	PAM
Final PPR	90 days after award end date	GOL
Final APR	90 days after award end date	PAM
Final SF-424C with actuals	90 days after award end date	PAM attached to POR
SAC Checklist	90 days after award end date	PAM attached to POR
Patent/Copyright Statement	90 days after award end date	PAM attached to POR
SF-428 tangible personal property report	90 days after award end date	PAM attached to POR
SF-429 real property report	90 days after award end date	PAM attached to POR
UCC-1 Filing (including Covenant of Use and Attorney's Certification)	90 days after award end date	PAM attached to POR
Program-Specific Audit (if applicable)	90 days after closeout period	PAM attached to POR (if submitted prior to closeout) or after closeout email Grants Specialist <u>and</u> send to DOC OIG

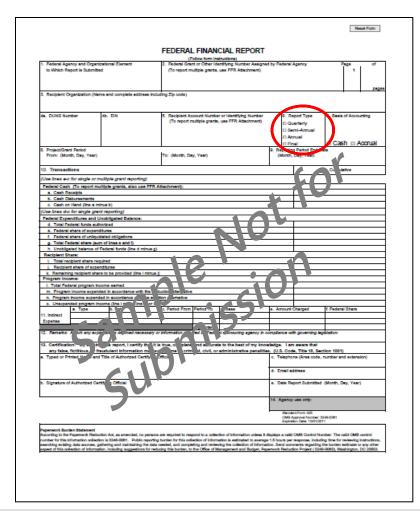
ARRA Report



- The ARRA report must be submitted within 14 days after the end of the quarter
- ARRA report must be marked as "Final" and 100% complete project status
- Funds received should match expenditures
- All vendors and subrecipients from previous reports must be included; report is cumulative
- Recipients should consult their Grants Specialists if any excess funds remain
- Submit via federalreporting.gov



Final FFR (SF-425)



- The FFR details all financial transactions from award inception to the completion of the award, including allowable costs that may be incurred during closeout
- Final FFR may not include any unliquidated obligations
- Line C (cash on hand) should be zero
- Submit via GOL



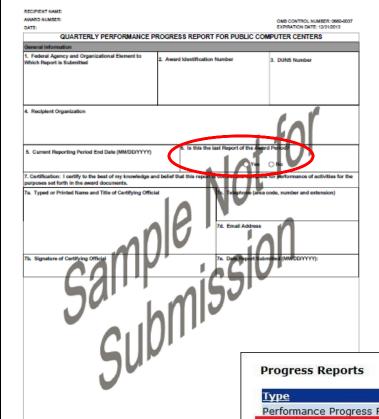
Quarterly PPR



- The quarterly PPR should describe the recipient's cumulative performance against project indicators for the final quarter (or portion thereof), using the same process and definitions as prior quarterly reports
- Recipients should not mark the PPR that covers the time period between the last quarterly report and the award end date as "Final"
- Recipients should submit the quarterly PPR on or no later than the regular schedule
- Submit via PAM (report package)



Final PPR



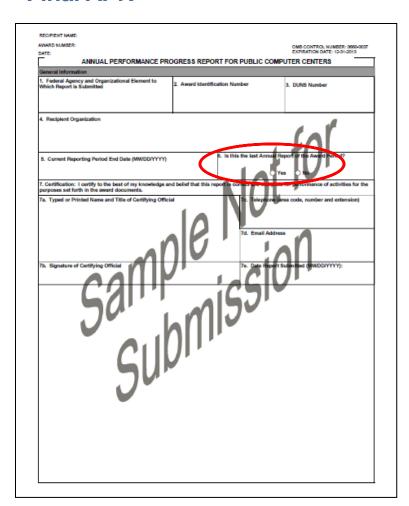
- The Final PPR should describe the recipient's performance against project indicators for the final quarter (or portion thereof), using the same process and definitions as prior quarterly reports
- Recipients should mark the PPR that covers the time period between the last quarterly report and the award end date as "Final"
- Submit via GOL

Progress Reports						
<u>Туре</u>	<u>ID</u>	Period Start	Period End	<u>Due Date</u>	<u>Status</u>	
Performance Progress Report	2218664	07/01/2010	09/30/2010	10/30/2010	Accepted	
Performance Progress Report - FINAL	2424869	07/01/2010	03/31/2013	06/29/2013	Not Delinquent	
Performance Progress Report	2224752	10/01/2010	12/31/2010	01/30/2011	Accepted	
Performance Progress Report	2224752	10/01/2010	12/31/2010	01/30/2011	Accepted	

Made Possible by the Broadband Technology Opportunities Program



Final APR



- A Final APR should be completed using the same process and definitions as prior annual reports and include the APR addendum and .kmz file
- A recipient must submit an APR for every year the award was active
- If the award end date falls within 2013, the recipient will submit an APR for 2013 and will mark it as final.
- If the award end date is 1/30/2014, the recipient will submit an APR for 2013 and an APR for 2014, marking the 2014 APR as final
- Submit via PAM (report package)

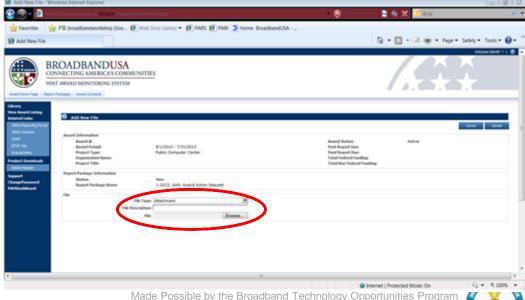




PAM Other Request (POR)



- The Final Closeout POR should be created as a PAM Other Request package and should specify in the description that the attached documents are being submitted for closeout
- All file descriptions should be noted as "Final" in PAM
- Please include a list of documents under Section 8 in the PAM - Other Request (POR)



Final SF-424C

	COST CLASSIFICATION		a. Total Cost		b. Costs Not Allowable for Participation	c. Total Allowable Costs (Columns a-b)
	Administrative and legal expenses	s	.00	s	.00	\$ 0.00
	Land, structures, rights-of-way, appraisals, etc.	\$.00	\$	00	\$ 0.00
ı.	Relocation expenses and payments	\$.00	s	.00	\$ 0.00
	Architectural and engineering fees	\$.00		.00	\$ 0.00
	Other architectural and engineering fees	\$		s	.00	\$ 0.00
	Project inspection fees	\$	NIC	\$.00.	\$ 0.00
	Site work	\$.00	\$.00.	\$ 0.00
	Demolition and removal	0	.00	\$.00	\$ 0.00
	Construction		.00		.00	\$ 0.00
0.	Equipment	s	00	s	.00	\$ 0.00
1.	Miscellaneous	\$. 451	\$.00	\$ 0.00
2.	SUBTOTAL (sum of lines 11)	s	15 70.00	s	0.00	\$ 0.00
3.	Continuncies	ş	.00	\$.00	\$ 0.00
4.	SUBT		0.00	\$	0.00	\$ 0.00
5.	Project (prostum) income	\$.00	\$.00	\$ 0.00
6.	TOTAL PROJECT COST (subtract = 5 fro #1)	\$	00.00	\$	0.00	\$ 0.00
			FEDERAL FUNDING			
7.	Federal assistance required as follows: (Consult Federal agency for Federal percentage share.) Enter the resulting Federal share.		nter eligible costs from line 1		Multiply X% These instructions will not print	\$ 0.00

- Recipients submit a Final SF-424C detailing actual expenditures from award inception to the completion of the grant period, inclusive of closeout costs incurred after the award end date
- The SF-424C totals should align with the total Federal expenditures and total match contributions (non-Federal expenditures) listed in the Final FFR and PPR
- Submit via PAM (POR)



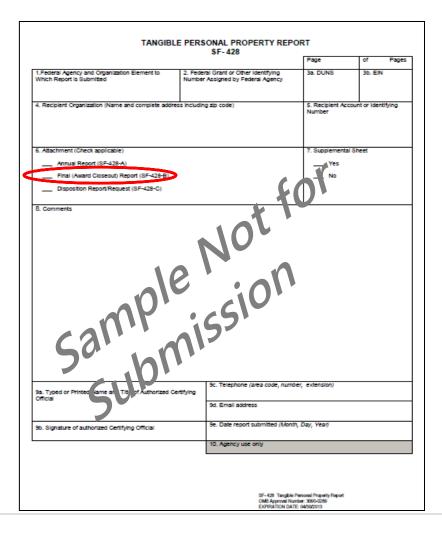
Property Management and Disposition (SF-428 and SF-429)

- According to the Uniform Administrative Requirement (UAR), title to equipment and supplies vests in the
 recipient upon acquisition and it must conduct an inventory every two years as long as the equipment has
 value over \$5,000. Recipients maintain this inventory for their records (i.e., they do not need to submit it to
 NTIA or NOAA)
- However, recipients must compensate the Government if they choose to sell or use acquired property for non-Federally sponsored programs:
 - Equipment with a per-unit current fair market value of \$5,000 or more or
 - Supplies with an aggregate residual unused value of \$5,000 or more
 - Real property (e.g., land, land improvements, structures, etc.)
- Recipients should report the Fair Market Value of the equipment, residual unused supplies, or real property as of the award end date
- Fair Market Value can be determined based on the purchase price and depreciation schedule maintained by the recipient





SF-428

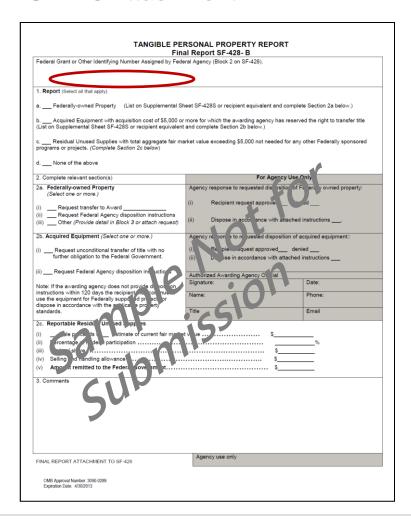


- Recipients account for BTOP-funded tangible personal property by completing a SF-428, SF-428B, and SF-428S
- All recipients must submit a SF-428 cover sheet and Attachment B
- If there is no tangible property to report, recipients should write "Not Applicable" under Section 8.
- A supplemental sheet, SF-428S, may be necessary to provide detailed information for each item
- Submit via PAM (POR)





SF-428 Attachment B



- The SF-428B is used during award closeout to allow recipients to request a disposition of acquired equipment and calculate compensation to be remitted to the Government
- Recipients select all applicable options in Section 1 and complete the corresponding questions 2a-2c
- Submit via PAM (POR)





SF-428 Attachment S

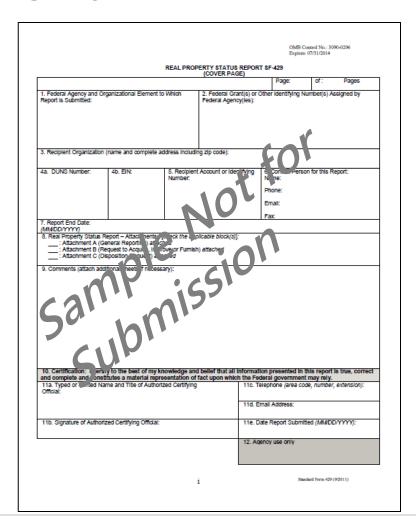


- The SF-428S is used by recipients to provide detailed information on individual items
- Grantees who checked "Yes" to Question 7 on the SF-428S or selected option 1b on the SF-428B should complete Attachment S or submit an equivalent document
- Submit via PAM (POR)





SF-429



- Recipients account for real property (e.g., land or improvements) by completing a SF-429
- All recipients must submit a SF-429 cover sheet even if there is no real property to report
- Only those who purchased/improved real property using BTOP funds or contributed it as match must complete the SF-429A
- Submit via PAM (POR)



SF-429 Attachment A

		B Control N sires: 07/31/2		
Real Property Status Report ATTACHMENT A (General Reporting) 8F-428-A				
Federal Grant or Other Identifying Number Assigned by Federal Agency (#2 on cover page)		Page:	of: Pag	es
emplete the applicable blocks below for each parcel of real property being reported (duplicat	te this page to p	rovide info	rmation for ea	soh paroe
real property being reported under the Federal financial assistance award identified in secti	ion 2):			
Period and type of Federal Interest (MM/DD/YYYY): From: To:				
Acquisition Renovation Construction Government Furnished Property [4a, Description of Real Property:				
4a. Description of Real Property.		.4		
4b. Address of Real Property (legal description and complete address including zoning information		N		
		_		
l4c. Land Acreage or Square Units: 14d. Gross and Usable Enter Amount: etc.):	us Foots t	Méters (Le	., of building, h	ouse,
Select units: Acres Square Feet Enter Amoulite: Gross	U	able		
Square KlometersSquare Meters Select UnitsSquare	Fut _Square	Meters		
A Curred B Co-Curred C Fee Simple	-			
D. Corporate E. Joint Tenancy F. Partnership G. Cmit Lis Par I. Government Furnished Property J. Other (Describe):	tnership	H. Co-Ope	rative	
14f. Real Property Cost: \$ Sh. Fer Intage %:				
	%]			
	201			
ion-Federal Share:	A			
Total (sum of Federal and Non-Federal Shall): \$ 49. Has a deed, lien, covenant, or other rel. Indicate the state of the st	%			
4g. Has a deed, lien, covenant, or other reliated (Unerstation been recorded to established established) Yes	intelled in this re	al property	?	
resNONO f yes (unless previously reported)_dricco e the insulament used and enter the date are jurisd tion	h which it was n	corded:		
4h. Has Federally required in the second for this reconsocial Yes See instructions for the de. Is.	No			
See instructions for the dell's.	Man			
See Instructions for cite is. All Are there any lifer, Reic isto. Act (URA) requirements as limite to thin real property?	YesNo			
, cs, de cro her attach additional sheets if nece ():				
4k In act ordy the with the National Historic Price attorn (ct.), HPA), does the namenty nossess h	nistoric significan	ce, and/or k	t listed or elic	ible for
At in ac into, is with the National Historic Piless attorn ct Ju-PAI, does the property possess to the construction of the property possess to the				
f yes, escribe them (attach add one) teb neck sary):				
Has a significant change occu. Id with the Joal property, or is there an anticipated change ex	spected during	he next rep	orting period	?
resNo ryes, describe a chambe (at ich anal sheets if necessary):				
6. Real Pro ty Dispos on Sulus: A. Sold C. Used in other Federally sponsore	ed project/proces	m		
D. Transferred ti E. Retained Title F. N/A	- projecojnogia			
I. If the Fed agency provided the recipient disposition instructions to sell or retain title to the	real omnerty en	er the amo	unt of funder	wed to
the Federal government:	real property, CII	are arrive	and rands t	andu w
II. If applicable, enter the amount of any net proceeds from the sale of the real property and des	cribe how the on	reeds were	distributed	
III. If the Federal agency directed the recipient to transfer title to the real property, enter the amount	unt of funds the F	ederal Age	ncy owes:	
7. Indicate the cumulative energy consumption for the previous 12 months:				
A. Electric (kiWh) or (Btu) B. Petroleum (Gal) C. Natural Gas (cu ft)	D. Other (S	pecify)		
Remarks (attach additional sheets if necessary):				
Attachment A (General Repor	tine) to Real Pro	erty Status	Report SF-429	
			,	
		Street and E	n 429 (92011)	
ii				

- The SF-429A allows recipients to provide the requested information in section 13-18 of Attachment A for each parcel of real property reported
- Submit via PAM (POR)





Final Patent Report

	ATTACHMENT
	FINAL PATENT REPORT
Recipient Name:	
Cooperative Agreement N	Tumber:
I certify that no s	ubject inventions were disclosed during the grant/cool fraine agreement period.
The final patents	eport is attached, listing all inventions di clos d du ng the award period.
The Recipient shall disclo writing to Recipient perso written report and shall id minimum, contain the foll (1) the title of the	
(5) that lawy A	fall invenors: address of the assignee (if any); component the United States has eight in the subject invention (i.e., the lists (ightse); the fitte present invention; fine disclosure nor summary of the part invention; und of the present invention of the prior art, nof the present invention of the prior art, in of the present invention; in of the present invention of the prior art, in of the present invention of the prior art, in of the present invention of the prior art, in of the present invention of the prior art, in of the present invention of the prior art, in of the present invention of the prior art, in of the present invention of the prior art, in of the present invention of the prior art, in of the present invention of the prior art, in of the present invention of the prior art, in of the prior art invention of the prior art, in of the prior art invention of the prior art, in of the prior art invention of the prior art, in of the prior art invention of the prior art, in of the prior art invention of the prior art, in of the prior art invention of the prior art in the prio
(19) SOLIAL ILLANES	n of the prefile edem owners, and is claime. So the prefile of must submit the following to the Grants Office:
(5) tes di	ober under which the invention was made; ther of the patent issued; suance,
a by of the	disclosure as issued (including the drawings) and; dress, and telephone number(s) of an assignee
Company Authorizing O	official Date
	Recipient determines that an invention or patent was made under the purview of the is document, they are instructed to forward the information to the Grants Officer.
	National Institute of Standards and Technology Grants & Agreements Management Division 100 Bureau Drive, Bldg. 411, Mail Stop 1650 Gaithersburg, MD 20399-1650

- The Final Patent Report is included as an attachment in the PAM (POR)
- NOAA will accept a letter on the recipient's letterhead, signed by the AOR, stating an invention or patent was not made under the award



Federal Interest - Covenant Of Use And Ownership

BROADBAND**USA** CONNECTING AMERICA'S COMMUNITIES Attachment A - SAMPLE Covenant of Purpose, Use and Ownership Form THIS COVENANT OF PURP UCC FINANCING STATEMENT National Telecommunicatio 1401 Constitution Avenue. called "NTIA"). WHEREAS, Recipi Technology Opportunities P Pub. L. No. 111-5, 123 Stat. WHEREAS, by Off assistance award designate (hereinafter called "Award A called "Project"); and WHEREAS, to exe with funds made available th hereto and incorporated her WHEREAS, on documents attached thereto and pertaining to the Award contained in the Award Agre Regulations (C.F.R.), Parts Reg. 33104 (Jul. 9, 2009) or applicable; and WHEREAS, the A provides, inter alia, that Rec not sell, lease, transfer, conor use the Property for purpo the application made by Red prohibited by 15 C.F.R. Part the RTOP Grants Officer of FORM SHOULD BE TYPEWRITTEN OR COMPUTER GENERATED

 NTIA retains an undivided equitable reversionary interest in all real or personal property that recipients and subrecipients acquire or improve using Federal funds for the entire useful life of the property

During the duration of the Federal Interest recipients cannot sell or transfer assets without prior Grants Office approval or use the property for non-BTOP purposes without prior approval

Recipients with a Security Interest SAC have to submit documentation:

- Covenant of Purpose to document the Federal Interest in real property
- UCC-1 to document the Federal Interest in fixtures or personal property other than supplies
- Attorney Certification that documents were properly executed and filed in accordance with state law





Program Specific Audit (For-Profit recipients only)

- Commercial and for-profit entities may have to submit a program specific audit if the recipient received a BTOP award greater than \$100,000
- A copy of the Audit Report must be submitted within 90 days following the closeout date to the DOC Office of the Inspector General (OIG) and PAM (POR)
- For-profit entities required to do a program-specific audit during the closeout period may pay for those audit expenses using BTOP funds





After NTIA reviews and submits closeout documentation, NOAA conducts a final review and takes the remaining steps to close the grant

- NOAA Grants Office will perform financial reconciliation and notify the recipient that the award has been satisfactorily closed
- If applicable, the Grants Office prepares a Deobligation Memo and submits it to the NTIA Budget Office
- Recipients must maintain records relating to the grant for at least three years after the recipient submits its final federal expenditure report
- Recipients must continue to comply with any ongoing audit and property management requirements





Early Closeout

- A recipient may want to terminate its award early after completing all project goals
- To initiate the process, a recipient should initiate a "Termination for Convenience" AAR and attach a letter from the recipient's AOR requesting that the award terminate early. Once approved, this action will amend the award end date to the new requested end date. Upon project completion, the recipient will need to send all final closeout materials to its Grants Specialist, FPO, and Closeout Analyst to close out the award
 - Amended award end dates will always fall on the last day of the quarter
- Recipients wanting to terminate their awards early should submit their requests in GOL





What happens after the award closes?



- After the award is closed, recipients must continue to:
 - Use BTOP-funded equipment for the purposes under the award
 - Retain grant file and related records for at least three years
 - Complete an inventory of grant-funded equipment
 - Update UCC-1 filings every five years





Additional Resources

- 15 CFR § 14.71 Closeout Procedures for Non-Profit and Commercial Entities and Institutions of Higher Education
- 15 CFR § 24.50 Closeout Procedures for State, Local, and Tribal Entities
- Department of Commerce Office of Acquisition Management Updated Grants
 Manual, Chapter 12 Award Close-out, available at

 <u>http://www.osec.doc.gov/oam/grants_management/policy/doc_grants_manual/default.htm.</u>
- Closeout documents are available on NTIA's website under Award Closeout Requirements at http://www2.ntia.doc.gov/compliance



Questions